REMARKS

Applicant is in receipt of the Office Action mailed December 28, 2007. Claims 1-33 remain pending in the application.

Rejections Under 35 U.S.C. § 103(a):

Claims 1, 4, 11, 12, 15, 22, 23, 26, and 33 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic (U.S. Patent No. 7,111,076), Helgeson et al.(U.S. Patent No. 6,643,652, hereinafter "Helgeson"), and Olson et al. (U.S. Patent No. 5,987,376, hereinafter "Olson"). Claims 2, 13, and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Law (WO 02/32171), Shaw et al. (U.S. Patent No. 6,362,836, hereinafter "Shaw"), and Chou et al. (U.S. Patent No. 6,247,056, hereinafter "Chou"). Claims 3, 14, and 25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Ozzie et al. (WO 01/06365, hereinafter "Ozzie"). Claims 5, 16, and 27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Aldred et al. (U.S. Patent No. 5,539,886, hereinafter "Aldred"). Claims 6, 7, 16, 18, 28, and 29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Harvey et al. (U.S. Patent No. 6,487,583, hereinafter "Harvey"). Claims 8, 19 and 30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Traversat et al. (U.S. Patent No. 7,167,920, hereinafter "Traversat"). Claims 9, 20, and 31 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Gupta et al. (U.S. Patent No. 7,051,102, hereinafter "Gupta"). Claims 10, 21, and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Bentali et al. (U.S. Patent No. 6,282,170, hereinafter "Bentali"). Applicant respectfully traverses the rejections in light of the following remarks.

To establish a *prima facie* case of obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP 2143.03. Applicant respectfully submits that the cited references, taken individually or in combination, do not teach or suggest all the limitations recited in the claims.

In particular, Applicant respectfully submits that the cited references, taken individually or in combination, do not teach or suggest a method comprising translating a message from an original format to a portable format on a first computer system, thereby generating a portable message, <u>wherein the portable message comprises metadata which comprise identifying characteristics of the source application</u>, in combination with the remaining features of claim 1. The Office Action cites Fig. 2 and claim 4 of Abjanic as teaching "wherein the portable message comprises metadata which comprise identifying characteristics of the source application." For at least the reasons discussed as follows, Applicant respectfully disagrees.

In Fig. 2 and the accompanying description (e.g., col. 4 line 32 through col. 5, line 67), Abjanic discloses a method for receiving and processing a message. The message may include a "request-line" identifying a requested program for processing the message headers (col. 4, lines 47-48) in addition to the body of the message representing "the application data or the XML data" (col. 4, lines 50-51). The request-line portion of the message provides an identification of a <u>target</u> application, i.e., a program for processing the message, but not identifying characteristics of the <u>source</u> application (see, e.g., col. 5, lines 1-3). As shown in the example of col. 4, lines 55-66, the body of the message is a document to be processed and does not comprise <u>identifying characteristics of the source application</u>. Although the example document includes a "From" field, the "From" field indicates an <u>individual or group</u> participating in the transaction (in the example, "intel.com") and thus does not comprise identifying characteristics of the source <u>application</u>.

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In claim 4, Abjanic discloses an apparatus "wherein if the message is transformed based on the validation template or a reference to a validation template then said validation template comprises either a Document Type Definition (DTD) or a schema." However, Applicant can find no teaching or suggestion that the Document Type Definition or schema provides <u>identifying characteristics of a source application</u>.

In the "Response to Arguments" section of the Office Action, the Examiner argues that "[t]he phrase 'identifying characteristics of the source application' is an overly broad phrase which does not specify particular characteristics of the source application." The Examiner then seems to argue that any XML message sent by Abjanic inherently has identifying characteristics of the source application. Applicant can find no teaching, suggestion, or other evidence of such a conclusion in Abjanic. As discussed above, Abjanic does not teach or suggest <u>any</u> element of a message that <u>identifies the source application</u> or otherwise comprises <u>identifying characteristics of a source application</u>.

Applicant also respectfully submits that the cited references, taken individually or in combination, do not teach or suggest a method comprising <u>routing the portable message to a target application on the second computer system based on the metadata</u>, in combination with the remaining features of claim 1. The Office Action asserts that Abjanic teaches this feature and cites locations such as Fig. 2 and col. 5, lines 22-24. For at least the reasons discussed as follows, Applicant respectfully disagrees.

In step 225 of Fig. 2, Abjanic discloses that the message may be directed or switched "based on the application data or XML data (e.g., the business transaction information) in the message." In col. 5, lines 22-24, Abjanic states that routing and switching decisions for the message may be based upon various types of business transaction information. However, Abjanic explicitly states that the routing or switching is based on <u>data</u> (e.g., business transaction information) rather than metadata. In particular, as stated in col. 5, lines 15-20, the business transaction information describes elements of the business transaction such as "To," "From," "items purchased," "purchase

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amount," and "quantity." There is no teaching or suggestion in Abjanic that these elements comprise metadata. Additionally, for at least the reasons discussed above, Abjanic fails to teach or suggest routing the portable message based on metadata comprising identifying characteristics of the source application.

Therefore, Applicant respectfully submits that Abjanic, Helgeson, and Olson, taken individually or in combination, fail to teach or suggest numerous limitations of claim 1. Even assuming, *arguendo*, that all the limitations recited in the claims are taught or suggested by Abjanic, Helgeson, and Olson, Applicant respectfully submits that it would not have been obvious to one of ordinary skill in the art at the time the invention was made to combine Abjanic, Helgeson, and Olson to produce the claimed invention.

For at least the reasons discussed above, Applicant respectfully submits that independent claims 1, 12, and 23 are patentably distinct from the cited references. Applicant asserts that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time. Thus, the dependent claims are believed to be allowable at least due to their dependence on the independent claims. Accordingly, Applicant respectfully requests withdrawal of the § 103(a) rejections.

CONCLUSION

In light of the foregoing amendments and remarks, Applicant submits the application is now in condition for allowance, and an early notice to that effect is requested.

If any extensions of time (under 37 C.F.R. § 1.136) are necessary to prevent the above-referenced application(s) from becoming abandoned, Applicant(s) hereby petition for such extensions. The Commissioner is hereby authorized to charge any fees which may be required or credit any overpayment to Meyertons, Hood, Kivlin, Kowert & Goetzel P.C., Deposit Account No. 50-1505/5602-12300/JCH.

Also filed herewith are the following items:

☐ Request for Continued Examination

☐ Terminal Disclaimer

☐ Power of Attorney By Assignee and Revocation of Previous Powers

☐ Notice of Change of Address

☐ Other:

Respectfully submitted,

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Date: February 28, 2008 JCH/MSW/RPH